

Griesen, J

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

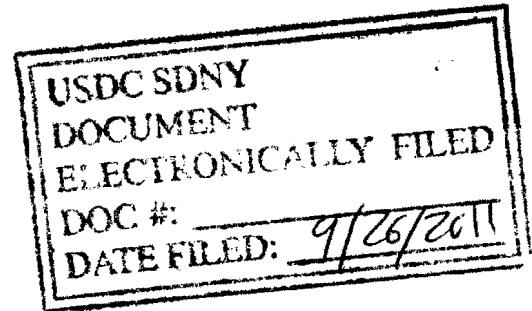
BURBERRY LIMITED (UK) and  
BURBERRY LIMITED (US)

Plaintiffs,

v.

BURBERRY-SCARVES.COM; PINGBURBERRYSCARF.COM;  
XIAO XIAO; CHEAPBURBERRYSCARF.COM;  
BURBERRY2U.COM; BALI BAO; INBURBERRY.COM; BOO  
BO; BURBERRYDRESS.COM; BURBERRYSCARF-UK.COM;  
BURBERRYSCARF-US.COM; ZHOU YINGJIE;  
USBURBERRYOUTLETS.COM; USBURBERRYSCARF.COM;  
XIAOBO QU; BURBERRYOUTLETSTORES.NET;  
USBURBERRYOUTLET.NET; BURBERRY-OUTLET-  
ONLINE.NET; UKBURBERRY.NET; WENG XIAO TENG;  
BURBERRY-OUTLET-ONLINE.COM; HUANG FEI FEI;  
BURBERRYOUTLETONLINE.NET; LIN BINBIN;  
BURBERRYOUTLETONLINES.COM; HUANG WEIBIN;  
BURBERRYUK.NET; USABURBERRY.COM;  
USABURBERRY.NET; LIN XIAOCHUN;  
BURBERRY4BAGS.COM; LIU QI DONG;  
BURBERRYLINES.COM; LINENQIAO;  
BURBERRY4HANDBAGS.COM; WANG DONG MU;  
MYBURBERRYSHOPS.COM; HE GU MING;  
BURBERRY-BAGS.COM; ZHONGLIN;  
BURBERRY-SCARF.NET; BEIXING; BURBERRY-BAG.ORG;  
TVB; BURBERRYONSLAE.COM; XIN ZHONG;  
MYBURBERRYOUTLET.COM; ZHANG DAMING;  
SALEBURBERRYBAGS.COM; LVDI; BURBERRY-SCARF-  
SALE.NET; LI JINGJING; BURBERRY-OUTLET.ORG; RALIX;  
TIKER; DISCOUNT-BURBERRY-HANDBAGS.ORG;  
US-BURBERRYOUTLET.COM; SAM WU a/k/a WU  
YUANSHENG; USBURBERRYOUTLET.COM; GRANT a/k/a  
WU GRANT; BURBERRYSCARF.ORG; LIN SHENG;  
BURBERRY-OUTLET-STORES.COM; LIU NAN;  
BURBERRYOUTLETONLINE.COM; LI XIAO BO;  
BURBERRY-OUTLET.NET; XYZ COMPANIES; and JOHN  
DOES 1-100.

Defendants.



10 CIV. 9240 (TPG)

**ORDER FINDING NEWLY-  
DETECTED DOMAINS WITHIN  
SCOPE OF CONTEMPT ORDER**

Upon the submission of the Plaintiffs, the Court concludes that the Defendants have continued to violate the terms of the Temporary Restraining Order, Preliminary, and Permanent Injunctions by continuing to expand their online counterfeit network, creating thirty-nine (39) additional domain names and related websites (the “Newly-Detected Domains”), each of which utilize domain names that incorporate one or more of the Burberry Trademarks (collectively, the “Newly Detected Domain Names”), including the following:

1. BurberryDeal.com;
2. BurberryHome.org;
3. BurberryOnline.net;
4. BurberryOnlineStore.net;
5. BurberryOutlets2011.com;
6. BurberryOutletScarf.org;
7. BurberryOutletW.com;
8. BurberrySale.net;
9. BurberrySale.org;
10. BurberryScarfOnline.org;
11. BurberryScarfOnSale.org;
12. BurberryScarfShop.org;
13. BurberryScarfStores.com;
14. BurberryStore.net;
15. BurberrySunglasses.org;
16. Burberrypl.com;
17. iBerry.net;
18. NiceBurberry.com;
19. OutletBurberry.org;
20. OutletsBurberry.net;
21. USA-Burberry.com;
22. BurberrySaleOnline.com;
23. BurberrySaleOnline.net;
24. BurberrySaleOnlineNow.com;
25. BurberrySaleOnlineNow.net;
26. BurberrySaleOnlineNow.org;
27. BurberrySaleOnlineOK.com;
28. BurberrySaleOnlineOK.net;
29. BurberrySaleOnlineOK.org;
30. BurberrySaleOnlines.com;
31. BurberrySaleOnlines.net;
32. TopBurberrySaleOnline.com.

33. BurberryNY.com;
34. BurberryOutletStore-UK.com;
35. BurberrySalesStore.com;
36. UK-BurberryOutletStore.com;
37. UK-BurberryStore.com;
38. US-BurberryOutletStore.com; and
39. US-BurberryOutletStore1.com.

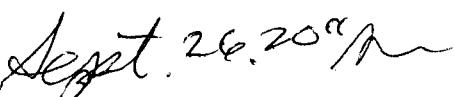
Plaintiffs continue to suffer irreparable harm and without the entry of an order holding the Defendants in contempt the Plaintiffs will suffer further irreparable harm; and so the Court:

**HEREBY ORDERS** that the Infringing Domain Names listed above are within the scope of the Court's Contempt Order, as amended.

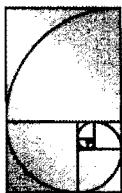
**SO ORDERED:**



Honorable Thomas P. Griesa  
United States District Court Judge

Dated: 

MM



# GIOCONDA

## LAW GROUP PLLC

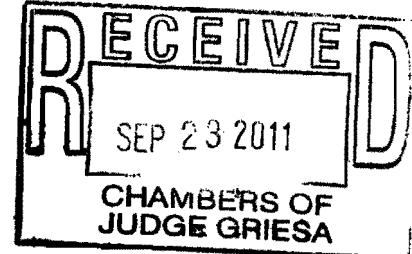
One Penn Plaza • 36th Floor  
Fashion Avenue & West 34th Street  
New York, NY 10119-0002  
Tel: (212) 786-7549

Bell Plaza • Suite 607  
42-40 Bell Boulevard  
Bayside, NY 11361-2201  
Tel: (718) 423-3610

Fax: (888) 697-9665  
E-Mail: Joseph.Gioconda@GiocondaLaw.com  
Website: www.GiocondaLaw.com

**Re:      Burberry Ltd. (UK) et al v. Burberry-Scarves.com et al  
10 Civ. 9240 (TPG) (SDNY)**

September 23, 2011



**By Hand, w/Enclosure**

Honorable Thomas P. Griesa  
United States Federal District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Your Honor:

Pursuant to the Court's Order Holding the Defendants in Civil Contempt, as amended by the September 15, 2011 Amendment ("Amended Contempt Order") in the above-captioned case, the Plaintiffs are writing to give the Court written notice that they have discovered new domain names registered by the Defendants that contain one or more of the Burberry Trademarks ("Newly-Detected Domains").

The following summarizes the information relevant thereto:

**GROUP A:**

1. BurberryDeal.com;
2. BurberryHome.org;
3. BurberryOnline.net;
4. BurberryOnlineStore.net;
5. BurberryOutlets2011.com;
6. BurberryOutletScarf.org;
7. BurberryOutletW.com;
8. BurberrySale.net;
9. BurberrySale.org;
10. BurberryScarfOnline.org;

11. BurberryScarfOnSale.org;
12. BurberryScarfShop.org;
13. BurberryScarfStores.com;
14. BurberryStore.net;
15. BurberrySunglasses.org;
16. Burberrypl.com;
17. iBurberry.net;
18. NiceBurberry.com;
19. OutletBurberry.org;
20. OutletsBurberry.net; and
21. USA-Burberry.com.

The Newly-Detected Domains listed above in Group A are connected to the Defendants in the action as follows:

- BurberryHome.org and BurberryOutlets2011.com both use the phone number (858) 381- 5886;
- BurberryHome.org and BurberryOnline.net redirect to BurberryOutlets2011.com, which also uses the email address saleoutlet2010@hotmail.com.
- BurberryOutlets2011.com also uses the email address BurberrySale@hotmail.com, which is also used by BurberryHome.org, BurberryOnline.net, BurberryOutletW.com, BurberrySale.org, BurberryScarfOnline.org; BurberryScarfOnSale.org; and BurberryScarfShop.org.
- In addition to using the email address BurberrySale@hotmail.com, several of the above websites, including BurberrySale.org, BurberryScarfOnline.org; BurberryScarfOnSale.org; and BurberryScarfShop.org also use the email address BurberrySale@hotmail.co.uk, which is linked to the websites: BurberryOutletScarf.org; BurberrySale.net and OutletBurberry.org.
- In addition to using the email addresses BurberrySale@hotmail.com and BurberrySale@hotmail.co.uk, several of the above websites, including BurberrySale.net and BurberrySale.org, are using the email address eglobtrade@hotmail.com, which is linked to the following websites: BurberryScarfStores.com and BurberrySunglasses.org.
- BurberrySunglasses.org shares the Internet Protocol (“IP”) address 69.175.20.162 with the following websites: BurberryOnlineStore.net, BurberryStore.net; Burberrypl.com, NiceBurberry.com, and OutletBurberry.org.
- The websites BurberryOnlineStore.net, BurberryStore.net, and NiceBurberry.com all use the email address BurberryOnlineShop@hotmail.com.
- BurberryOnlineStore.net and BurberryStore.net use FashionPay.com during the checkout process. BurberryDeal.com and iBurberry.net also connect through FashionPay.com.

- NiceBurberry.com provides links to BurberryDeal.com and iBurberry.net on its website.
- BurberryHome.org, BurberryOnline.net, and BurberryOutlets2011.com have overlapping Whois information.
- BurberrySale.net, BurberrySale.org and BurberryScarfOnSale.org have overlapping Whois information.
- The website USA-Burberry.com uses the email address outlerseller@hotmail.com.

GROUP B:

22. BurberrySaleOnline.com;
23. BurberrySaleOnline.net;
24. BurberrySaleOnlineNow.com;
25. BurberrySaleOnlineNow.net;
26. BurberrySaleOnlineNow.org;
27. BurberrySaleOnlineOK.com;
28. BurberrySaleOnlineOK.net;
29. BurberrySaleOnlineOK.org;
30. BurberrySaleOnlines.com;
31. BurberrySaleOnlines.net; and
32. TopBurberrySaleOnline.com.

The websites listed above in Group B are connected to the Defendants in the action as follows:

- The websites associated with these Infringing Domains all share a common IP address.
- BurberrySaleOnline.com, BurberrySaleOnlineNow.com, BurberrySaleOnlineNow.net, BurberrySaleOnlineNow.org, BurberrySaleOnlineOK.com, BurberrySaleOnlines.com, and BurberrySaleOnlines.net all redirect to TopBurberrySaleOnline.com, which uses the email address SmithOutlet@gmail.com, which was an e-mail address associated with 3 of the original websites.
- TopBurberrySaleOnline.com also uses the email address BeatriceOutlet@gmail.com, which is used by the following websites: BurberrySaleOnlineOK.com, BurberrySaleOnlineOK.net, and BurberrySaleOnlineOK.org.

GROUP C:

33. BurberryNY.com;
34. BurberryOutletStore-UK.com;
35. BurberrySalesStore.com;
36. UK-BurberryOutletStore.com;
37. UK-BurberryStore.com;

38. US-BurberryOutletStore.com; and
39. US-BurberryOutletStore1.com.

The websites listed above in Group C are connected to the Defendants in the action as follows:

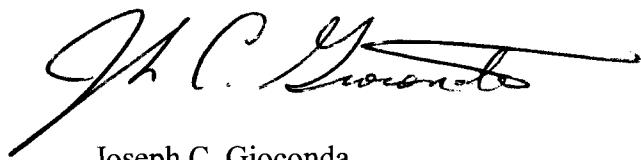
- The registrant of BurberryNY.com, BILSAM is nearly the same name as the registrant of USAAbuberryOutlet.com (SAM BILL).
- BurberryNY.com uses the email address reebokzigtecheasytone@hotmail.com, which is linked to at least 9 other websites involved in the contempt action. The owner is ARM, who is also the owner of at least 5 websites involved in the contempt action.
- The contact information available on the websites BurberryOutletStore-UK.com, UK-BurberryOutletStore.com, US-BurberryOutletStore.com, US-BurberryOutletStore1.com, and UK-BurberryStore.com all list Ellen as the manager with the address of New York, 10030 United States. Ellen was also the manager of BurberryHandbagsSales.com and BurberryProrsum.org.
- BurberryOutletStore-UK.com, UK-BurberryOutletStore.com, US-BurberryOutletStore.com, US-BurberryOutletStore1.com, and UK-BurberryStore.com websites all share the same IP address 184.94.43.37.
- The websites BurberryOutletStore-UK.com and UK-BurberryOutletStore.com are associated with the IP address 184.95.37.82. This IP address is associated with at least nine (9) websites from the contempt action.
- There are also overlaps in registrant naming, website formatting, email addresses, and IP address blocks.

As these new domain names listed above in Groups A, B and C all incorporate the BURBERRY trademark and are related to the defendants in our present action, these domain names constitute Newly Detected Domains and are therefore subject to the Contempt Order.

Therefore, Plaintiffs respectfully request that the Court enter an order finding these Infringing Domain Names within the scope of the Contempt Order, in the form attached hereto. Thank you, Your Honor.

Respectfully Submitted,

The Gioconda Law Group PLLC



Joseph C. Gioconda

Enclosure